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November 30, 2001

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**VIA ELECTRONIC FILING**

Magalie Roman Salas, Secretary  
Federal Communications Commission  
445 – 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Attention: Patrick Forster, Senior Engineer (3-A104)**  
**Policy Division**  
**Wireless Telecommunications Bureau**


**Re: Notification of Status of Facilities**  
**CC Docket No. 94-102**  
**Broadband PCS Stations KNLH232 and KNLH234**  
**TRS Number: 816412**

Dear Ms. Salas:

On behalf of North Dakota Network Co., and pursuant to the Commission's Public Notice, Mimeo No. DA 01-2459 (released October 19, 2001), we hereby submit this supplement to its November 9, 2000 status report on its implementation of Wireless E911 Phase II Automatic Location Identification service, and its September 19, 2001 Petition for Waiver.

Please direct any questions or correspondence regarding this filing to our office.

Sincerely,

  
John A. Prendergast  
Kathleen A. Kaercher

Attachment

**North  
Dakota  
Network  
Company**  
**A SUBSIDIARY OF SRT**

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Magalie Roman Salas, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, D.C. 20554

**Attention: Patrick Forster, Senior Engineer (3-A104)**  
**Policy Division**  
**Wireless Telecommunications Bureau**

**Re: Implementation Plans of Wireless E911 Phase II**  
**Automatic Location Identification**  
**Public Notice Pertaining to CC Docket No. 94-102**  
**TRS Number: 816412**

Dear Ms. Salas:

In accordance with the Public Notice, Mimeo No. FCC 01-302 (released October 19, 2001), and pursuant to the informal request of Commission staff, North Dakota Network Co. (NDNC) hereby supplements its November 9, 2000 status report, and its September 19, 2001 Petition for Waiver, to request that its licenses be included in any blanket waiver or E911 implementation extension that the Commission might grant small and mid-sized operators. While NDNC has not received any PSAP requests for either Phase I or Phase II service, NDNC has diligently pursued its deployment of Phase I service, and expects to be Phase I capable imminently.


NDNC is a subsidiary of SRT Communications Inc., a rural telephone company, and will be providing PCS service primarily to rural or non-urbanized communities. As a small market carrier, NDNC does not have the buying power of national carriers, or the clout to influence equipment design and development. NDNC expects that it will have to wait until the handset requirements of the larger carriers are satisfied before it will be able to obtain Phase II compliant handsets.

In its September 19 Petition for Waiver, NDNC informed the Commission that it would be able to begin selling and activating location capable handsets starting July 1, 2002, and that it would ensure that at least 25 percent of all new handset activations are location-capable by September 30, 2002. NDNC requested an extension until March 30, 2003 to ensure that 50 percent of its new handsets are location capable, and until September 30, 2003 to ensure that all of its new handsets are location-capable, achieving 95 percent penetration of location capable handsets among its subscribers by September 20, 2006. NDNC further requested until October 1, 2002 or six months after the PSAP request (whichever is later) to begin delivering E911 Phase II service to the PSAP.

NDNC notes that the above-described extension request is substantially similar to that of Sprint PCS, which also operates a CDMA network, but is slightly adjusted to accommodate a rural operator. NDNC would extend Sprint's handset-deployment timetable by only a year at the most. While NDNC feels that this extension is reasonable, it is aware that it has to depend on equipment manufacturers to assist it in deploying E911 service. Therefore, while NDNC intends to make every effort to meet or exceed the above deadlines, NDNC respectfully requests that its September 19 waiver request be granted, or that it be included in any blanket waiver or implementation extension provided by the Commission.

Any questions concerning this filing should be directed to John A. Prendergast at Blooston, Mordkofsky, Dickens, Duffy and Prendergast, at 202/659-0830.

Respectfully submitted,  
**NORTH DAKOTA NETWORK CO.**  
d/b/a SRT Wireless

By   
Warren L. Hight  
General Manager/CEO

November 30, 2001